

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

GILBERTO MARTINEZ GOMEZ  
LAURA MARGARITA SERRANO SANTANA  
  
DEBTORS

CASE NO 12-03113/MCF

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S UNFAVORABLE REPORT  
ON POST CONFIRMATION PLAN MODIFICATION, DOCKET NO. 57,  
AND IN COMPLIANCE WITH ORDER, DOCKET NO. 59**

TO THE HONORABLE COURT:

**NOW COME,** GILBERTO MARTINEZ GOMEZ and LAURA MARGARITA SERRANO SANTANA, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed an unfavorable report on proposed post confirmation Plan modification, docket no. 57, dated August 16, 2013.

2. On August 13, 2013, the debtors filed a post confirmation modification of Plan, docket no. 55, to consent to the lift of stay in favor of secured creditor Banco Popular de Puerto Rico, claim no. 11, and cure the arrears owed to the Trustee.

3. With this information debtors respond to the *Trustee's Unfavorable Report on Post Confirmation Plan Modification*, docket no. 57, dated August 16, 2013.

**WHEREFORE** debtors respectfully pray that Trustee's unfavorable recommendation be denied.

**I HEREBY CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the participants/debtors, Gilberto Martinez Gomez and Laura Margarita Serrano in the above captioned case.

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Reply to Trustee's unfavorable report  
Case no. 12-03113/MCF

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 6<sup>th</sup> day of September,  
2013.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
PO BOX 186  
CAGUAS PR 00726-0816  
TEL (787)744-7699 FAX (787)746-5294  
EMAIL: [rfigueroa@rfclawpr.com](mailto:rfigueroa@rfclawpr.com)